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November 23, 2022

Nancy Marconi  
Registrar  
Ontario Energy Board  
2300 Yonge Street, P.O. Box 2319  
Toronto, ON, M4P 1E4

Dear Ms. Marconi:

**RE: EB-2022-0200 Enbridge Gas Inc. 2024 Rebasing Application  
Energy Probe Intervenor and Cost Eligibility Request Letter**

Energy Probe Research Foundation (Energy Probe) hereby applies for intervenor status and cost eligibility in the EB-2022-0200 proceeding, the application by Enbridge Gas Inc. to the Ontario Energy Board for the approval of its 2024 rebasing.

### Statement of Interest

Energy Probe is a non-profit environmental and consumer organization which promotes economic efficiency in the use of resources. It will be representing its many individual residential customer supporters. Energy Probe argues for equitable rates that optimize results for all ratepayers by eliminating cross subsidies between ratepayer classes and between generations of ratepayers. It promotes sustainable resource use through individual responsibility and accountability. More information about Energy Probe can be found on the OEB website.

<https://www.oeb.ca/industry/applications-oeb/intervenor-information/annual-filings-frequent-intervenors>

Energy Probe's interest in this proceeding is the impact on customers including its supporters of the 2024 rebasing proposed by Enbridge Gas. Energy Probe's supporters live in the Enbridge franchise area and will be directly affected by the Application.

**Energy Probe Research Foundation** 565 Bloor Street West, Toronto, Ontario, M5S 1Y6

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Energy Probe will focus on the following areas:

- capital expenditures forecast,
- prudence of capital expenditures since last rebasing,
- capitalization of indirect overheads,
- asset management plan,
- Energy Transition Technology Fund,
- compensation including benefits and pensions,
- allocation of corporate shared services,
- operations, management, and administration savings achieved since amalgamation,
- integration of storage operations,
- allocation of costs between regulated and unregulated storage,
- market-based storage increase,
- Parkway Delivery Obligation and Parkway Delivery Commitment Incentive,
- depreciation methodology,
- heat value methodology and the heating degree days forecast,
- methodology for forecasting unaccounted for gas,
- average use and revenue forecast,
- increase in equity thickness,
- incentives rate mechanism,
- rate harmonization,
- cost allocation and rate design.

## **Hearing**

Energy Probe supports the request by Enbridge for an oral hearing and plans to be an active participant in the hearing.

## **Costs**

Energy Probe is a non-profit organization which relies on individual donations to help protect the public interest. Without the prospect of an award of costs, Energy Probe's ability to participate in proceedings would be very limited. Energy Probe intends to seek a cost award in this proceeding and expects to participate responsibly in accordance with the Board's guidelines regarding cost awards.

## Communications

Communications relating to this Intervenor and Cost Eligibility Request Letter and all documents filed with the Board by the applicant and required by Energy Probe, should be directed to its consultants:

Tom Ladanyi TL Energy Regulatory Consultants Inc. 41 Divadale Drive Toronto ON M4G 2N7 Tel: 416 423-3685 <a href="mailto:tom.ladanyi@rogers.com">tom.ladanyi@rogers.com</a>	Roger Higgin SPA Inc. 15 Malabar Place Don Mills, Toronto Ontario M3B 1A4 416-391-0738 <a href="mailto:spainc@rogers.com">spainc@rogers.com</a>
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Respectfully submitted on behalf of Energy Probe.

Tom Ladanyi  
TL Energy Regulatory Consultants Inc.  
Consultant representing Energy Probe

cc. Patricia Adams (Energy Probe Research Foundation)  
Roger Higgin (Sustainable Planning Associates Inc.)  
Vanessa Innis (Enbridge Gas Inc.)